

**IN THE UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF DELAWARE**

<b>(Names sealed and protected by court order)</b>	)	<b>C. A. No. 1:23-CV-00989-JLH</b>
Plaintiffs,		

V.

**Bolivarian Republic of Venezuela, et al.**

The Honorable Jennifer L. Hall

United States District Court for the District of Delaware

844 N. King Street

Wilmington, DE 19801

**Re: Freitas, et al. v. Bolivarian Republic of Venezuela, et al. Case No.  
1:23-CV-00989-JLH**

Honorable Judge Jennifer L. Hall,

We hope this letter finds you well. We, the Plaintiffs in the above-referenced case, respectfully write to express our profound concern regarding the delays in addressing our ex parte requests. As individuals representing ourselves pro se, we wish to underscore the critical nature of our pending motions and the pressing need for timely judicial intervention.

The Plaintiffs have faced significant challenges since the inception of this litigation, including specific and credible threats to our safety. As detailed in our previous filings, the potential harm from further delays is substantial. Our ex parte

requests are not merely procedural but are pivotal to ensuring the protection and confidentiality of the Plaintiffs, whose safety and well-being are at imminent risk.

We wish to highlight that the pending ex parte motions, both electronic and paper filed, were submitted as Emergency Motions months ago, the first of them on May 30th. Today is July 16th, and despite the urgency of these motions, they remain unaddressed. The delays in addressing these Emergency Motions are exacerbating our situation and increasing the risks we face.

Moreover, it is important to highlight that we are not only facing potential future risks but are also enduring ongoing damages that are continually worsening. These damages include psychological distress, financial losses, and social ostracism, all directly resulting from the threats and harassment we have encountered. The delays in addressing our ex parte requests exacerbate these harms and place us in an increasingly precarious situation.

In addition to the ongoing damages, we are also being actively persecuted and targeted by criminals linked to the Defendants. This persecution has further endangered our lives and has had a profound impact on our day-to-day existence. The unauthorized disclosures have made us more visible targets, increasing our risk of physical harm and making us bullseyes for retaliatory actions by these criminal elements.

We respectfully remind the Court of the following key points necessitating prompt action:

1. **Specific Threats and Ongoing Damages** : We have documented multiple instances of threats and harassment, including risks and ongoing actions of physical harm and cyber harassment, directly linked to the defendants. These

threats have escalated since the filing of our motions (D.I. 54 and D.I. 56). The ongoing nature of these threats has led to continuous harm, including severe psychological and financial distress, and we are being actively persecuted by criminals linked to the Defendants as reported to the court.

2. Safety and Confidentiality : The Plaintiffs' safety and confidentiality are paramount. The recent unauthorized disclosures have already compromised our security, and further delays exacerbate our vulnerability and ongoing damages. We seek the Court's immediate action to mitigate these risks and halt the worsening harm.

3. Judicial Precedent : The Third Circuit recognizes the need for judicial discretion in sealing records and granting ex parte requests when disclosure poses a significant threat. The balance of public access and Plaintiffs' safety clearly favors maintaining confidentiality in this case, as outlined in \*Publcker Industries, Inc. v. Cohen\*.

Given the gravity of these concerns, we urge the Court to prioritize our ex parte requests. Immediate judicial intervention is critical to prevent further harm to the Plaintiffs and to uphold the integrity of the judicial process.

We appreciate your attention to this urgent matter and are hopeful for a swift resolution that ensures the safety and protection of the Plaintiffs.

Thank you for your understanding and prompt action.

Respectfully submitted,

**/s/ Jorge Alejandro Rodriguez**

**Jorge Alejandro Rodriguez**

**Pro Se Plaintiff**

Name and address:

Identification	Signature	Address
Lead Plaintiff JR Plaintiff 2 IF Plaintiff 3 EV Plaintiff 4 AM Plaintiff 5 MO Plaintiff 6 PM Plaintiff 7 JC		All %  Eichholzstrasse 2,  6312 Steinhausen, Switzerland